

# **United States v. Andrade**

## **Defendant's Sentencing Memorandum**

### **ATTACHMENT-4**

## FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/20/2018

## FEDERAL GRAND JURY INFORMATION

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The purpose of this report is to summarize a partial review of financial records associated with Jack Abramoff and Landfair Capital Consulting through June 2018. These records were provided by various bank in response to a grand jury subpoena. Not all of the information contained in the records are summarized in this report.

**Chase Bank account xx2312 Business Checking.** (Chase Bank [REDACTED] Landfair Capital Statement.pdf and Chase Bank [REDACTED] Landfair Capital Statement B.pdf) Records from September 12, 2017 to June 29, 2018. This account was opened on September 12, 2017 by Alexander Benjamin Abramoff who identified himself as "President" with telephone number [REDACTED]. The company address was listed a 537 Landfair Avenue, Los Angeles, California. Alex Abramoff was the only authorized signer.

This account was opened with a \$3,000 check deposit from the Landfair Bank of America xx7280 dated September 13, 2017. On September 25, 2017 a \$10,000 Bank of America cashier's check was purchased by Alex Abramoff and deposited.

October 18, 2017 a \$2,200 electronic withdrawal was made to Judith Lamassan. Rent-related recurring payment.

March 13, 2018 Block Bits Fund 1 wired \$150,000 into the account.

March 19, 2018 \$75,000 was withdrawn by cashier's check with Alex Abramoff as the remitter. This check was deposited into the Landfair account of Bank of America xx7280.

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Investigation on 08/10/2018 at Monterey, California, United States (, Other (Document Review))

File # 58D-SF-2113481-GJ Date drafted 08/10/2018

by ROAHN WYNAR

FD-302a (Rev. 05-08-10)

58D-SF-2113481-GJ

(U) Partial review of financial records  
associated with Landfair Capital  
Consulting

Continuation of FD-302 of \_\_\_\_\_, On 08/10/2018, Page 2 of 11

The remaining transactions were only the \$2,200 periodic rental payments to Lamassan.

**Bank of America account xx7280 business checking.** This account was opened on April 1, 2017 by Alex Abramoff who identified himself as the president and secretary of Landfair Capital Consulting EIN number 82-0981138 which was identified as a "S-corporation." Alex Abramoff ("Alex") was the only authorized signer.

Calendar Year 2017:

Alex transferred \$4,000 into this account from his personal Bank of America account xx9135.

April 21: Deposit of \$50,000 from Shalli Kumar by check with the memo line "Consulting". The expenditures for April appeared to be routine living expenses associated with residency in the Westwood area of Los Angeles, California.

In May Alex transferred \$5,000 to his personal checking account (BoFA xx9136) and had only routine living expenses.

June 9: Deposit from Shalli Kumar for \$5,000 by check memo line "Consulting."

June 19: Paul Erickson wired \$5,000 into the account for his Wells Fargo account. On the same day Pangea LLC wired \$5,000 from a Wells Fargo account into this account with the memo lines "consulting". On June 28, 2017 Pacific Ventures wired \$5,000 into this account.

July 6: Credit card payment xx3284 for \$7,600.

July 10: Payment made to Sugar Mountain Holdings for \$25,000 at Comerica Bank by wire with memo "Block Bits". Pacific Ventures deposited \$10,000 by wire. On July 12 Pangea LLC deposited \$5,000.

July 12: Payment made to CCJ Strategies for \$5,000 to Chase Bank. Transfer to Alex's personal checking xx9136 for \$5,000.

July 12: Pangea LLC deposited \$5,000 for "consulting".

July 13: The Watley Group LLC deposited \$57,500 for "consulting fees" by wire from US Bank. Sugar Mountain Holdings deposited \$50,000 by wire from Comerica Bank.

FD-302a (Rev. 05-08-10)

58D-SF-2113481-GJ

(U) Partial review of financial records  
associated with Landfair Capital  
Consulting

Continuation of FD-302 of \_\_\_\_\_, On 08/10/2018, Page 3 of 11

July 14: Paul Erickson wired \$10,000 from Wells Fargo.

July 17: Samuel Mann wired \$15,000 from Wells Fargo.

July 21: Alex transferred \$5,000 to personal checking xx9136.

July 24: Payment made to Block Bits Fund I at First Republic Bank for \$75,000 by wire with memo line "Block Bits." Also "customer withdrawal" for \$39,830 was and "official check sale". Two checks were produced one was to 67 Wall Street Owner LLC for "12 Months Rent" and one was to the same company for "Security Deposit."

July 31: Payment to credit card xx3284 for \$1,614. Also payment to Marcus Andrade for \$20,000 at Capital One by wire with memo line "AML Bitcoin".

August: two online banking payments to credit cards: xx3284 and xx3004.

August 3: Teller deposit \$20,000 in Westwood area Los Angeles, California. Frank Abramoff check with memo line "Bitcoin."

August 16: Payment to Integrated PR for \$5,000 by check for "Capital Makeover: BB". Related to Bitcoin Brigage reality television show.

August 17: Payment to Neil McCabe for \$2,000 by bank transfer.

August 18: Payment to Judith Lamassan for \$6,600 by check with the memo line, "1st, last, security".

August 31: "Customer withdrawal" for \$3,500.

August 31: A check was presented for \$3,240 from Daniel Hoff Agency, Inc. Trust Account 5455 Wilshire Boulevard Suite 100 Los Angeles Ca (323) 932-2500 to be paid to "Patrick Cronen". This check was endorsed by Cronen and cashed.

August 31: A check was presented for \$5,000 from Jae Sung Kim of 999 E. Valley Blvd, Alhambra, California. The check was written to "Bank of America" and drawn against Hanmi Bank account number 4264 5102 5122 3211 Jae S Kim. This check appears to have been cashed and does not reflect on the statements.

September 1: ACE Funding deposited \$20,000. This is likely a loan.

FD-302a (Rev. 05-08-10)

58D-SF-2113481-GJ

(U) Partial review of financial records  
associated with Landfair Capital  
Consulting

Continuation of FD-302 of \_\_\_\_\_, On 08/10/2018, Page 4 of 11

September 1: Bank transfer to the account of Peter Roff [note: author of AML Bitcoin articles] for \$5,000.

September 1: Alex pays Toyota financial \$995.

September 11: Deposit of \$75,000 from Marcus Andrade by check. Andrade's address was on the check: "2915 Mansion Drive, Missouri City, Texas (361) 244-0156.

September 11: Two checkcard payments to Carlos De La Guardia for a total of \$1,001. One might have been a test payment for \$1.

September 12: Payment to Neil McCabe by bank transfer for \$5,000. This transaction may have been reversed on October 3.

September 13: Payment to Optima Tax Relief for \$4,000 by wire.

September 13: Check to Landfair Capital Consulting for \$3,000 with memo "Debit".

September 14: Payment to Alex Abramoff for \$15,000 by check with memo line "Chase PCA".

September 15: Payment to Peter Roff by bank transfer for \$5,000.

September 15: Payment to Peter Ferrara of \$1,000 by wire to Wachovia Bank.

September 19: Bank transfer of \$4,000 "abramoff".

September 19: Checkcard deposit from Carlos De La [Guarida - incomplete name on statement] for \$1,000.

September 22: Payment to Block Chain Entertainment LLC for \$3,000 by check with memo line "Debit".

September 25: Customer withdrawal \$10,010. The withdrawal slip contained the address "Landfair Capital Consulting 10982 Roebling Ave #336, Los Angeles, California.

September 26: Payment to Jack Abramoff at Eastern Savings Bank for \$10,000 by wire.

October 2: ACE Funding Services deposited \$23,761.

FD-302a (Rev. 05-08-10)

58D-SF-2113481-GJ

(U) Partial review of financial records  
associated with Landfair Capital  
Consulting

Continuation of FD-302 of \_\_\_\_\_, On 08/10/2018, Page 5 of 11

October 2: Payment to Toyota financial for 995 memo line  
"Lease\_Pay".

October 3: Reversal of \$5,000 payment to Neil McCabe.

October 3: Payment to Jack Abramoff for \$10,000 at Wells Fargo by  
wire.

October 5: Deposit from Fintech Fund Family Limited Partnership for  
\$35,000 by Wells Fargo check. The check was signed by Randy Wooten.  
The address of Fintech Fund was 6625 FM 1960 AD W STE 214 Houston  
Texas 77069-4210. The address on the deposit slip was "Landfair  
Capital Consulting 100 North Tryon Street, Charlotte North Carolina  
28255.

October 5: Payment to Marcus Andrade for \$20,000 at Capital One by  
wire.

October 6: Payment to Frank Abramoff for \$16,500 by check with memo  
"Nara and BU"

October 9: Payment to Peter Ferrara for \$1,000 by check.

October 10: Deposit from Rabbi David B Lapin for \$20,000 by wire  
from Bank of America.

October 11: ACE Funding Source deposit for \$18,489.

November 2: Payment to Toyota financial for \$995.

November 8: Payment to Mendelson and Mendelson CPA's for \$1,320  
memo "invoice # 221331, 221 330".

November 20: Deposit from Coinbase \$831.

December 1: Payment to Toyota Financial \$995.

December 13: Payment to Hillel at UCLA for \$10,000 by check  
illegible memo.

December 27: Payment to Porsche Walnut Creek for \$4,299 by check  
with memo "Drikkoff & shipping" [illegible, approximate]

December 29: Payment to Franchise Tax Board for \$15,000.

FD-302a (Rev. 05-08-10)

58D-SF-2113481-GJ

(U) Partial review of financial records  
associated with Landfair Capital  
Consulting

Continuation of FD-302 of \_\_\_\_\_, On 08/10/2018, Page 6 of 11

Calendar year 2018

January 2: Payment to Toyota Financial for \$995 memo "Lease\_Pay".

January 3: Deposit from Law Office of Neil M Sunkin for \$33,333 at  
Comerica

Bank by wire.

January 4: Payment to Coinbase for \$4,772.

January 9: Deposit ACE Funding Source for \$36,182.

January 16: Two payments to Jack Abramoff each for \$10,000 at  
Eastern Savings Bank by wire memo "Consulting fees January 2018."

January 19: Deposit of \$2,000 from Frank Abramoff by check memo  
"For Verde" [illegible].

January 25: Payment to Porsche Agent for \$658 by wire memo "Bill  
Pay".

January 26: Payment to IRS for \$42,922 memo "USA TaxPymt".

January 30: Payment to David Mann of \$15,000 by check.

January 31: Deposit from Frames Per Second of \$20,000 by wire memo  
line "AML Bitcoin"

February 2: Payment to Toyota Financial for \$995 memo "Lease\_Pay".

February 8: Two transfers to Landfair Capital each for  
\$10,000 memo "CON:Jack Abramoff."

March 13: Deposit from ACE Funding Source for \$7,416.

March 19: Deposit of \$75,000 from Alex Abramoff from Chase Bank by  
cashier's check.

March 30: Payment to Menachem Lichter for \$21,000 at Chase Bank by  
wire memo "JA Payment".

March 30: Payment to Jack Abramoff for \$10,000 at Wells Fargo by  
wire memo "Consulting". A second \$10,000 wire was made to Eastern  
Savings bank.

FD-302a (Rev. 05-08-10)

58D-SF-2113481-GJ

(U) Partial review of financial records  
associated with Landfair Capital  
Consulting

Continuation of FD-302 of \_\_\_\_\_, On 08/10/2018, Page 7 of 11

April 26: Payment to Jack Abramoff for \$10,000 at Wells Fargo by wire. A second \$10,000 wire was made to Eastern Savings bank.

May 17: Transfer to Landfair Capital Con:the Wately Group LLC for \$2,000.

May 23: Deposit from NAC Payroll Services for \$50,000 at Wells Fargo by wire.

June 8: Payment to Jack Abramoff for \$10,000 at Wells Fargo by wire memo "Consulting fee." A second \$10,000 wire was made to Eastern Savings bank.

**Bank of America account xx5482 business checking.** This account was opened on April 1, 2017 by Alex Abramoff who identified himself as the president and secretary of Landfair Capital Consulting EIN number 82-0981138 which was identified as a "S-corporation." Alex Abramoff ("Alex") was the only authorized signer.

There was not activity in this account from its opening through June 2017. FBI records only cover this short period. It is possible this account was closed at that time. There was never any balance in the account during the reviewed period.

**Wells Fargo account for Jack Abramoff xx6484.** The bank statements covered the period November 4, 2014 through May 31, 2018. The statements for this account were mailed to 812 Edelblut Drive, Silver Spring MD 20901-1411. This account was essentially dormant until January 9, 2016 when \$50,000 from deposited and wired out on the same day. This initial deposit was a check from Frank Abramoff labeled "gift".

Calendar year 2015:

November 17: Deposit of \$2080 from Conservatives for Energy Freedom signed by Deborah Dooley via PNC Bank by check.

Calendar year 2016:

February 5: Deposit of \$25,000 from Frank Abramoff labeled "Loan."

February 8: Payment of \$5,000 online transfer to Pnc Nk NA

March 15: Deposit \$30,000 from Frank Abramoff labeled "Loan."

March 18: Payment \$10,000 by check.



FD-302a (Rev. 05-08-10)

58D-SF-2113481-GJ

(U) Partial review of financial records  
associated with Landfair Capital  
Consulting

Continuation of FD-302 of \_\_\_\_\_, On 08/10/2018, Page 8 of 11

April 20: Deposit \$20,000 from Frank Abramoff (trustee) labeled "gift."

April 25: Payment \$10,000 by check.

May 19: Deposit \$20,000 from Frank Abramoff labeled "Loan."

June 8: Deposit \$20,000 from Frank Abramoff labeled "Loan."

June 10: Payment: \$10,000 by check.

July 19: Deposit \$20,000 from Frank Abramoff (trustee) labeled "gift."

July 21: Payment: \$10,000 by check.

August 15: Deposit \$20,000 from Frank Abramoff (trustee) labeled  
"Loan.".

September 8: Deposit \$20,000 from Frank Abramoff (trustee) labeled  
"gift."

October 11: Deposit \$20,000 from Frank Abramoff (trustee) labeled  
"gift."

November 16: Deposit \$20,000 from Frank Abramoff (trustee) labeled  
"gift."

December 21: Deposit \$20,000 from Frank Abramoff (trustee) labeled  
"loan."

Calendar year 2017:

January 19: Deposit \$10,000 from Sepo Holdings via Citibank wire.

February 7: Deposit \$10,000 from Sepo Holdings via Citibank wire.

February 16: Deposit \$20,000 from Sepo Holdings via Citibank wire.

March 3: Deposit \$20,000 from Sepo Holdings via Citibank wire.

March 21: Deposit \$20,000 from Sepo Holdings via Citibank wire.

April 20: Deposit \$10,000 from Sepo Holdings via Citibank wire.

May 2: Deposit \$10,000 from Sepo Holdings via Citibank wire.

May 12: Deposit \$10,000 from Sepo Holdings via Citibank wire.

FD-302a (Rev. 05-08-10)

58D-SF-2113481-GJ

(U) Partial review of financial records  
 associated with Landfair Capital  
 Consulting

Continuation of FD-302 of \_\_\_\_\_, On 08/10/2018, Page 9 of 11

June 5: Deposit \$10,000 from Sepo Holdings via Citibank wire.  
 June 21: Deposit \$10,000 from Sepo Holdings via Citibank wire.  
 July 7: Deposit \$10,000 from Sepo Holdings via Citibank wire.  
 July 26: Deposit \$10,000 from Sepo Holdings via Citibank wire.  
 August 3: Deposit \$10,000 from Sepo Holdings via Citibank wire.  
 August 21: Deposit \$20,000 from Sepo Holdings via Citibank wire.  
 September 1: Deposit \$10,000 from Sepo Holdings via Citibank wire.  
 September 19: Deposit \$10,000 from Sepo Holdings via Citibank wire.  
 October 3: Deposit \$10,000 from Landfair Capital Consulting via Bank of America wire.  
 October 17: Deposit \$10,000 from Sepo Holdings via Citibank wire.  
 November 1: Deposit \$10,000 from Sepo Holdings via Citibank wire.  
 November 20: Deposit \$20,000 from Sepo Holdings via Citibank wire.  
 December 1: Deposit \$10,000 from Sepo Holdings via Citibank wire.  
 December 27: Deposit \$20,000 from Sepo Holdings via Citibank wire.

Calendar year 2018:

January 16: Deposit \$10,000 from Sepo Holdings via Citibank wire.

**Eastern Savings Bank - Jack Abramoff xx6501:** These records covered the period of February 28, 2013 through January 31, 2017. This account was dormant until November 2016:

Calendar year 2016:

October 31, 2016: Deposit of \$11,000 from Jack R. Maple of 1532 E Baristro Road Pam Springs of Maple Tree Marketing Services DBA Atlas Holdings International Property Management, California via Citibank wire.

November 4: Deposit of \$10,000 also from Maple Tree.

FD-302a (Rev. 05-08-10)

58D-SF-2113481-GJ

(U) Partial review of financial records  
associated with Landfair Capital  
Consulting

Continuation of FD-302 of \_\_\_\_\_, On 08/10/2018, Page 10 of 11

November 21: Deposit of \$6,000 also from Maple Tree with memo "Karri Simmons Payment - 21K paid to date - This payment brings it to 27K."

November 29: Deposit of \$12,000 also from Maple Tree with memo "Karri Simmons Case Total payments \$39,000".

December 5: Payment of \$2,000 to Sepo Holdings via check memo "Loan."

Calendar year 2017:

January 18: Deposit of \$10,000 from Sepo Holdings.

March 21: Deposit of \$10,000 from Sepo Holdings.

May 12: Deposit of \$10,000 from Sepo Holdings.

June 5: Deposit of \$10,000 from Sepo Holdings.

July 7: Deposit of \$10,000 from Sepo Holdings.

August 3: Deposit of \$10,000 from Sepo Holdings.

September 3: Deposit of \$10,000 from Sepo Holdings.

September 19: Deposit of \$10,000 from Sepo Holdings.

September 26: Deposit of \$10,000 from Sepo Holdings.

October 17: Deposit of \$10,000 from Sepo Holdings.

November 1: Deposit of \$10,000 from Sepo Holdings.

November 16: Deposit of \$6,000 from Sepo Holdings.

December 1: Deposit of \$10,000 from Sepo Holdings.

December 27: Deposit of \$10,000 from Sepo Holdings.

Calendar year 2018:

January 1: Deposit of \$20,000 from Sepo Holdings.

January 16: Deposit of \$10,000 from Sepo Holdings.

February 9: Deposit of \$10,000 from Landfair Capital.

March 8: Deposit of \$10,000 from Sepo Holdings.

FD-302a (Rev. 05-08-10)

58D-SF-2113481-GJ

(U) Partial review of financial records  
associated with Landfair Capital  
Consulting

Continuation of FD-302 of \_\_\_\_\_, On 08/10/2018, Page 11 of 11

March 30: Deposit of \$10,000 from Sepo Holdings.

April 26: Deposit of \$10,000 from Landfair Capital.

May 18: Deposit of \$10,000 from Sepo Holdings.

June 8: Deposit of \$10,000 from Landfair Capital.

June 22: Deposit of \$10,000 from Landfair Capital.

**Credit Card xx3284.** The credit card expenses were consistent with routine living expenses in Los Angeles, California in the vicinity of Beverly Hills, Santa Monica, Malibu, West Hollywood, and other locations. On July 3, 2017 a \$5,000 payment was made to Jim Falk Lexus Finance of Beverly Hills and one relatively expensive meal at La Gondola in Beverly Hills for \$248 were the only notable expenses. Some occasional travel to Las Vegas, Nevada was noted. No charges associated with Maryland or Northern Virginia were noted. The period of review was June 14, 2017 through March 10, 2018.

Landfair's Bank of America checking xx7280 routinely paid on this card.